

1 Jack P. Burden, Esq.
 Nevada State Bar No. 6918
 2 Jacquelyn Franco, Esq.
 Nevada State Bar No. 13484
 3 Dallin Knecht, Esq.
 Nevada State Bar N. 16263
 4 **BACKUS | BURDEN**
 5 3050 South Durango Drive
 Las Vegas, NV 89117
 6 (702) 872-5555
 (702) 872-5545
 7 jburden@backuslaw.com
 8 JaquelynFranco@backsulaw.com
dallinknecht@backuslaw.com
 9 *Attorneys for Defendants,*
Albertson's LLC and Albertson's Stores Sub, LLC

11 **UNITED STATES DISTRICT COURT**

12 **DISTRICT OF NEVADA**

13	MARIA DE JESUS BRIONES RENTERIA, as)	Case No. 2:22-cv-02048-RFB-BNW
14	an individual)	
)	<u>STIPULATION AND [PROPOSED]</u>
15	Plaintiff,)	<u>ORDER TO EXTEND DISCOVERY</u>
	vs.)	<u>DEADLINES</u>
16)	<u>(First Request)</u>
17	ALBERTSON'S LLC; ALBERTSON'S)	
18	STORES SUB, LLC; DOE MANAGER; DOE)	
19	JANITOR; DOE EMPLOYEERS; DOES I-X;)	
	and ROE CORPORATIONS I-X, inclusive,)	
)	
	Defendants.)	

20 Plaintiff Maria De Jesus Briones Renteria, and Defendants Albertson's LLC and
 21 Albertson's Stores Sub, LLC, do hereby stipulate and agree to the extension of the discovery
 22 deadlines in the current scheduling order and discovery plan in this matter for a period of sixty
 23 (60) days for the reasons explained herein.
 24

25 Pursuant to Local Rule IA 6-1(a), the parties state that this if the first such discovery
 26 extension requested in this matter.
 27

28 ...

...

DISCOVERY COMPLETED TO DATE – LR 26-3(a)

1. Plaintiff served Initial FRCP 26 Disclosures on January 1, 2023
2. Plaintiff served written discovery on January 10, 2023
3. Defendant served Initial FRCP 26 Disclosures on January 12, 2023
4. Defendant served written discovery on February 6, 2023
5. Defendant served its First Supplemental FRCP 26 Disclosure on February 9, 2023
6. Defendant responded to Plaintiff's written discovery on February 9, 2023
7. Defendant served its Second Supplemental FRCP Disclosure on March 2, 2023
8. Plaintiff responded to Defendant's written discovery on March 23, 2023

DISCOVERY REMAINING – LR 26-3(b)

1. Deposition of Plaintiff (Noticed for May 23, 2023)
2. Deposition of Defendant employees (Noticed for May 11, 2023)
3. Deposition of Defendant's 30(b)(6) designee
4. Disclosure of expert witnesses
5. Disclosure of rebuttal witnesses
6. Depositions of Plaintiff's treating physicians
7. Depositions of Experts
8. Additional depositions (as needed)

REASONS FOR EXTENSION – LR 26-3(c)

Pursuant to LR IA 6-1 and LR 26-3, the parties represent that good cause exists for the extension of the current discovery deadlines. The parties have experienced delay in the scheduling of depositions and based on information learned through discovery anticipate taking more depositions than initially contemplated.

The parties have acted in good faith in discovery to date. Neither party has any intent, nor reason, to delay the resolution of this matter. A 60-day extension will allow the parties to evaluate,

consult, and retain the proper experts to support their case, as well as allow necessary time for all depositions.

NEW DISCOVERY DEADLINES – LR 26-3(d)

	Current Deadline	New Deadline
Deadline For Expert Witnesses	May 29, 2023	July 28, 2023
Deadline To Amend Pleadings/Add Parties	Closed	Closed
Deadline For Rebuttal Experts	June 28, 2023	August 26, 2023
Discovery Deadline	July 28, 2023	September 26, 2023
Deadline To File Dispositive Motions	August 28, 2023	October 27, 2023
Pretrial Order Deadline	September 27, 2023	November 27, 2023

...

...

...

...

...

...

...

...

...

...

...

...

...

1 If this extension is granted, all anticipated additional discovery should be concluded
2 within the stipulated extended deadline. The parties represent that this request for extension of
3 discovery deadlines is made by the parties in good faith and not for the purpose of delay.
4
5

6 **IT IS SO STIPULATED** and agreed as to the terms and conditions of this Stipulation to Extend
7 Discovery Deadlines.
8

9 DATED: May 5, 2023

10 /s/ Peter A. Mazzeo
11 Peter A. Mazzeo, Esq.
12 Mazzeo Law LLC
13 631 South 10th Street
Las Vegas, Nevada 89101
Attorney for Plaintiff

DATED: May 5, 2023

/s/Jack P. Burden
Jack P. Burden, Esq.
Dallin Knecht, Esq.
Backus | Burden
3050 S. Durango Dr.
Las Vegas, Nevada 89117
Attorneys for Defendants

14
15 **ORDER**

16 **IT IS SO ORDERED**

17 **DATED:** 3:55 pm, May 08, 2023

18 

19
20 **BRENDA WEKSLER**
21 **UNITED STATES MAGISTRATE JUDGE**
22
23
24
25
26
27
28